8. FCC Rule and Order 96-326, paragraph 28
9. Summary of FCC 96-487 at para. 6 Federal Register Jan. 22, 1997, Vol. 62, No. 14, pages 3232-3240
10. Letter from Dr. Robert Cleveland Jr. Ph.D., FCC Office of Engineering and Technology, dated January 23, 1997, to Ms. Lucinda Grant, Electrical Sensitivity Network, P.O.Box 4146, Prescott, AZ, 86302
11. Environmental Protection Agency (EPA) Proposed Alternatives for Controlling Public Exposure to Radiofrequency Radiation, in the Federal Register, Wed. July 30, 1986, Vol. 51, No. 146, pages 27317-27339
12. For example see FCC 96-326, footnote 1 on page 1.
13. Points (a) to (d) from Nov. 9, 1993 letter of M.Oge, EPA Director of the Office of Radiation and Indoor Air, to the Commission regarding ET-Docket 93-62
14. Discussed futher in section #7.8, and already discussed in section #4.2.2. Noted in Ad-Hoc Association FCC 96-326 Petition at pg. 16 and at footnote 111.
15. The Commission has stated, "The basis for these limits, as well as the basis for the 1982 ANSI limits that the Commission previously specified in our rules, is an SAR limit of 4 watts per kilogram. [FCC 96-326, paragrah 3].
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occured as low as 30 microwatts/sq. cm. for certain pulsed modulations. Hence, since the same wavelength was used for both power densities, the average SAR is estimated to be 0.01 W/kg, which is 1/400th of 4 W/kg.

27. V. Belokrinitskiy, "Destructive and Reparative Processes in Hippocampus with Long Term Exposure to Nonionzing Microwave Radiation," in U.S.S.R. Report, Effects of Nonionizing Electromagnetic Radiation, No. 7, JPRS 81865, pp. 15-20, Sept. 27, 1982.
Note: in this report an effect deemed adverse by the author was observed at 10 microwatts per sq. cm. at for a 12.6 cm wave length (2380 MHz). Durney (see footnote 28) shows that for a worst case the average SAR = 0.4 W/kg per 1 mW/sq. cm., thus exposure should be about 0.004 W/kg or 1/1000th of 4 W/kg. Thus, an estimate of 0.0067 W/kg is conservatively high, and 0.0067 is 1/600th of 4 W/kg.

28. Durney, 1986: Radiofrequency Radiation Dosimetry Handbook, October 1986, USAFSAM-TR-85-73, Brooks Air Force Base, TX, 78235-5301 and reference [B21] in IEEE 1991

29. Letter from R. W. Niemier of the National Institute of Occupational Safety and Health (NIOSH) to the FCC , dated January 11, 1994, regarding ET Docket 93-62

30. Letter from L.J.Gill of the Food and Drug Administration, Center for Device and Radiological Health, to the FCC, dated November 10, 1993 regardeing ET Docket 93-62

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37. Environmental Protection Agency letter from Margo Oge dated November 9, 1993 to the Federal Communications Commisson regarding ET Docket 93-62

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104 FCC Fact Sheet #2, September 1997, "National Wireless Facilities Siting Policies", answer to question #7 refers to the Institute of Electrical and Electronics Engineers as among "expert entities".
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25. Conclusion: Given the above Commission should assure the above is met including that:

(1) RF exposure should be minimized to the extent possible.

(2) A RF health and safety program should exist as specified by OSHA and which mitigates any increase in worker risk

(3) Protections provided by FCC rules, i.e. from body heating, should be stated, and effects (cancer) reported at levels below the FCC hazard threshold should be listed in FCC materials

(4) No 'grandfathering' of facilities, but all Commission licensees should follow its new rules

(5) Out-of-compliance conditions shall be detected, especially when tall transmitters are close to

nearby multi-story buildings resulting in out-of-compliance exposures at upper floor levels.

(6) Reduce environmental exposures to 40% of present values associated with given internal rates of absorption of RF energy - based on a computer method found valid by the FCC.

(7) Reduce the FCC hazard threshold to no more than 15% of its current value - based upon the accepted RF standard setting criteria of disruption of learned behavior and scientific papers acceptable for standard setting.

(8) Determine that local regulation of RF exposure limits effects the "operation" of wireless transmitters and so is not preempted in the Telecommunications Act of 1996.

(9) Determine that FCC exposures should be reduced to 5%, 1%, or even 0.1% of current standards, and if the Commision is not able to do so, to identify those effects as reported in this proceeding which occur at exposure levels such that protection limits 1/100th of the exposure levels at which these effects occur are below the exposure limits which the Commission may set. The public and workers which may be exposed so such levels should be notified that some evidence suggests that if the effects are real, that protection from these effects may not be provided by the Commission's limits.

(10) Expsoure limits should not be so wide that "a reasonable person" would not want to live or work in areas with such high exposure conditions, 'reasonable' including one who is knowledgable of the effects reported in this proceeding and to be reported in the scientific literature.

(11) The Commission should not 'take' property, per the 5th or 14th amendments where the use of property is substantially affected due to the level or other characteristics of the RF exposure.

The Commission should seek the evaluation of the federal health agencies, as noted above, concerning RF health claims made in this proceeding, since the Commission does not have expertise in this area, but is responsible that its limits be properly protective.

Respectfully Submitted

David Fichtenberg

Dated: June 10, 1997

David Fichtenberg
Spokesperson for the Ad-Hoc Association of Parties Concerned About the Federal Communications Commission's Radiofrequency Health and Safety Rules et al
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FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

January 23, 1997

Lucinda Grant
Electrical Sensitivity Network
P.O. Box 4146
Prescott, AZ 86302

Dear Ms. Grant:

Your letter of September 19, 1996, to Reed E. Hundt, Chairman of the Federal Communications Commission (FCC), was forwarded to this office for a response. Your letter related the concern you have over the future proliferation of telecommunications services and the effect this may have on individuals who are "electrically sensitive."

The FCC recently adopted guidelines for evaluating human exposure to radiofrequency (RF) emissions from FCC-regulated telecommunications sources (61 Fed. Register 41,006, 1996). These guidelines were based on recommendations made to the FCC by the various agencies of the U.S. Government which are responsible for human health and safety. These agencies include the Environmental Protection Agency (EPA), the Food and Drug Administration (FDA), the National Institute for Occupational Safety and Health and the Occupational Safety and Health Administration. All of these agencies have expressed their support for our guidelines and their appropriateness for protecting human health.

Since the FCC is not a health and safety agency, we have neither the jurisdiction or the resources to investigate the biological effects you describe. We must rely upon the agencies mentioned above for advice and guidance in such areas. Therefore, if you have evidence for harmful biological effects for which our guidelines do not provide protection, it is appropriate that you take this up with the agencies mentioned above, particularly the EPA and the FDA.

I hope that this information will be helpful. If you have any further questions please write this office directly, or you can call our RF Information Line at: (202) 418-2464.

Sincerely,

Robert F. Cleveland, Jr.

Robert F. Cleveland, Jr., Ph.D.
Office of Engineering & Technology
Federal Communications Commission

cc. R. Engelman